

1 *shall be treated as a nonresident alien individual engaged in*
 2 *trade or business within the United States, and any income*
 3 *described in section 1441(b) (1) or (2) which is received*
 4 *by such individual shall, to the extent derived from sources*
 5 *within the United States, be treated as effectively connected*
 6 *with the conduct of a trade or business within the United*
 7 *States.*

8 “(d) *ELECTION TO TREAT REAL PROPERTY INCOME*
 9 *AS INCOME CONNECTED WITH UNITED STATES BUSI-*
 10 *NESS.—*

11 “(1) *IN GENERAL.—A nonresident alien individ-*
 12 *ual who during the taxable year derives any income—*

13 “(A) *from real property held for the produc-*
 14 *tion of income and located in the United States,*
 15 *or from any interest in such real property, in-*
 16 *cluding (i) gains from the sale or exchange of such*
 17 *real property or an interest therein, (ii) rents or*
 18 *royalties from mines, wells, or other natural deposits,*
 19 *and (iii) gains described in section 631 (b) or (c),*
 20 *and*

21 “(B) *which, but for this subsection, would not*
 22 *be treated as income which is effectively connected*
 23 *with the conduct of a trade or business within the*
 24 *United States,*

25 *may elect for such taxable year to treat all such income*